

6.0 CEQA Environmentally Superior Alternative/NEPA Preferred Alternative/LEDPA

This section summarizes the environmental advantages and disadvantages associated with the proposed project and the alternatives. Based on this discussion, the environmentally superior alternative is identified as required by CEQA. The CEQA Guidelines, Section 15126 (d)(4) state that if the environmentally superior alternative is the No Project Alternative, then the next most environmentally superior alternative must also be identified. NEPA requires that all reasonable alternatives, including the alternative of no action, should be analyzed, and the NEPA Lead Agency's preferred alternative, or alternatives, should be identified unless another law prohibits the expression of such a preference. Issuance of a Department of the Army permit, under Section 404 of the Clean Water Act, is prohibited unless the Army Corps of Engineers (ACOE) has determined that the project constitutes the Least Environmentally Damaging Practicable Alternative (LEDPA). In this context, "practicable" means "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes."

6.1 Comparison of Proposed Project and Alternatives

To facilitate a clear understanding of the relative merits of the various alternatives, this section highlights the major differences between the impacts of the alternatives and proposed project. The project-specific alternatives that were evaluated in Section 5.0 included the two proposed project options (raw and treated water) and three main alternatives. Alternatives evaluated included:

- Proposed Project – Treated Water Option
- Proposed Project – Raw Water Option
- No Project Alternative
- NWP 1997 EIR Alternative
- Phased Treated and Raw Water Alternative

The EIR includes an analysis of the No Project Alternative, as required by CEQA and NEPA guidelines. However, pursuant to CEQA Guidelines, Section 15126 (d)(4) and the requirements of NEPA Section §1502.14, the No Project Alternative may not be legally feasible to be identified as the CEQA or Federal agency's preferred alternative.

Table 6.1 provides a summary of the impacts for the proposed project and alternatives. Table 6.2 provides an overview of the environmentally preferred alternative for each issue area, the duration of the predominant adverse impacts, and the rationale for identifying the CEQA environmentally superior alternative. In weighing the relative merits of the proposed project and alternatives, long-term impacts received a much higher weighting than short-term impacts. As a result, some issue areas may have favored one particular alternative based on a number of short-term impacts, but another alternative for only one or two long-term impacts.

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
Hydrology and Water Quality (Section 5.1)				
WQ.1 – Potentially significant impact of degradation of surface water quality and groundwater quality due to contamination by fuel or other materials related to construction activities.	Class II	Class II	Class II	Class II
WQ.2 – Increased turbidity impacts from construction work within the water bodies. OR WQ.10 – For the 1997 south side intake location and design, there would be an increased potential for turbidity in discharges from the MCWRA power plant during NWP intake construction.	Class III	Class III	Class I	Class III
WQ.3 – Potentially significant impact from interruption or reduction of water deliveries during drought and resulting water shortages to the participants.	Class II	Class II	Class II	Class II
WQ.4 – Potential impact of prolonged (over one week) shutdown of releases from Lake Nacimiento during minimum pool conditions, resulting in water shortages at Water World Resorts and Heritage Ranch.	Class II	Class II	Class II	Class II
WQ.5 – Significant impacts to groundwater from sea water intrusion in Salinas Basin.	Class II	Class II	Class II	Class II
WQ.6 – Potential degradation of groundwater quality resulting from aquifer discharge using Lake Nacimiento water containing elevated metals concentrations.	No Impact	Class II	Class II, more severe than for the Raw Water Option due to an additional discharge area	Class II, this impact will cease after the WTP starts its operation
WQ.7 – Potential nuisances caused by the presence of vegetation in the ponds and/or eutrophication.	No Impact	Class II	Class II, more severe than for the Raw Water Option due to an additional discharge area	Class II, this impact will cease after the WTP starts its operation
WQ.8 – Impacts from lack of sufficient capacity of the Paso Robles Discharge Area to take full NWP deliveries.	No Impact	Class II	Class II	Class II, this impact will cease after the WTP starts its operation
WQ.9 – Impacts from lack of sufficient capacity of the City of Paso Robles' Thunderbird well field to extract the total combined water right to Salinas River underflow after adding the NWP water right.	No Impact	Class II	Class II	Class II, this impact will cease after the WTP starts its operation

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
Geology, Seismicity, and Soils (Section 5.2)				
GS.1 – Ground rupture along the Rinconada fault could damage project facilities.	Class II	Class II	Impact lessened due to less potential to be directly astride of Rinconada Fault	Class II
GS.2 – Locating the Rocky Canyon Water Storage Tank and Happy Valley Pump Station near the Rinconada fault zone may result in poor foundation conditions.	Class II	Class II	Impact lessened due to less potential to be directly astride of Rinconada Fault	Class II
GS.3 – Excavation in rock or soils containing asbestos may cause risk to human health.	Class II	Class II	Class II	Class II
Drainage, Erosion, and Sedimentation (Section 5.3)				
DE.1 – Potentially significant impact of changes to surface water flow patterns during construction.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.2 – Potentially significant impact of damage to construction sites if flood flows occur while a pipeline is being installed in a streambed.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.3 – Potentially significant impacts to surface waters of increased turbidity and sedimentation, and to groundwater recharge in streams crossed and paralleled due to clearing, grading, trenching, and backfilling activities.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.4 – Potentially significant impact of erosion and downstream sedimentation from a pipeline rupture.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.5 – Potentially significant impact of scouring occurring in stream channels that expose buried pipeline or undermine pipeline bridge abutments or cable caissons.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.6 – Potentially significant impact of increased or concentrated storm runoff flowing onto erodible soils from impervious surfaces.	Class II	Class II	Class II, potentially more adverse impact due to larger number of stream crossings	Class II
DE.7 – Potentially significant impact of high river flow or bank erosion resulting in damage to branch pipelines or discharge piping in the three discharge areas.	No impact	Class II	Class II	Class II until the WTP starts operation and water discharge areas stop operating

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
Air Quality (Section 5.4)				
AQ.1 – Construction activities would generate air emissions that would impact air quality in the area.	Class I	Class I	Class I, potentially more severe	Class I, potentially less severe
AQ.2 – Operations of the project facilities would generate air emissions that could impact air quality in the area.	Class II	Class III, significantly lessened because the WTP would not operate	Class II	Class II
AQ.3 – Increased emissions of toxic compounds due to the project could result in increased health risks.	Class III	Class III, significantly lessened because the WTP would not operate	Class III	Class III
AQ.4 – Project Conformity with the Clean Air Act.	Class III	Class III	Class III	Class III
AQ.5 – Project Consistency with the County Clean Air Plan.	Class III	Class III	Class III	Class III
Noise (Section 5.5)				
N.1- Construction noise would temporarily increase ambient daytime noise levels along the pipeline route and near the pump station and WTP sites.	Class II	Class II	Class I	Class II
N.2 – Operations noise from pumps would increase long-term ambient noise levels.	Class III	Class III	Class III	Class III
N.3 - Periodic testing and emergency use of generators would increase short-term ambient noise levels near the pump stations.	Class II	Class II	Class II	Class II
Hazards and Hazardous Materials (Section 5.6)				
HM.1 – During construction of the proposed pipeline on the Camp Roberts property, unexploded military ordnance could be encountered, which could expose construction workers to explosion hazards	Class III	Class III	Impact avoided	Class III
HM.2 – Earth-moving operations during construction could uncover contaminated soils and other hazardous materials, including naturally occurring asbestos, creating health risks to construction workers and public.	Class II	Class II	Class II	Class II
HM.3 – During construction, hazardous utilities could be damaged by construction equipment. This could expose construction workers and public to hazardous materials transported by the damaged pipelines..	Class II	Class II	Class II	Class II
HM.4 – Releases of hazardous or flammable materials during construction could pose risks of fire or contamination.	Class III	Class III	Class III	Class III

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
HM.5 – Contaminated materials in the soil could enter into the pipeline expose water users to contamination and pose health risks.	Class III	Class III	Class III	Class III
HM.6 – During operation of the WTP, the employees and public could be exposed to the hazardous chemicals transported to, used, and stored at the plant.	Class II	Impact avoided	Class II	Class II
HM.7 – Accidental release of large quantities of treated water into a fresh water body could be harmful to the organisms in the water body.	Class III	Impact avoided	Class III	Class III
Biological Resources (Section 5.7)				
BR.1 – Potentially significant impacts to terrestrial biological resources from heavy construction machinery and various construction activities..	Class II	Class II	Class II (Impact avoided on Camp Roberts)	Class II
BR.2 – Impacts to riparian, water, and wetlands habitats and their biological resources from construction activities..	Class II	Class II	Class II (Impact avoided for Salinas River Crossings)	Class II
BR.3 – Impacts to wildlife from noise due to the project construction and operation phases.	Class II	Class II	Class II	Class II
BR.4 – Impacts to wildlife in drainages due to erosion, sedimentation and dewatering.	Class II	Class II	Class II	Class II
BR.5 – Impacts to plants from dust emission due to the project construction phase.	Class II	Class II	Class II	Class II
BR.6 – Impacts to aquatic life from treated water spills in case the treated water pipeline ruptures during operational phase of the project.	Class III	No Impact	Class III	Class III
BR.7 – Impacts to fish in Lake Nacimiento due to pumping through the water intake during operational phase of the project.	Class III	Class III	Class III	Class III
BR.8 – Impacts to fisheries during operational phase of the proposed project.	Class III	Class III	Class III	Class III
BR.9 – Impacts to riparian habitat due to construction of the water discharge areas in the vicinity of Salinas River.	No Impact	Class II	Class II	Class II
Cultural Resources (Section 5.8)				
CR.1 – Soil moving construction activities (e.g., trenching, excavating) could impact significant and important paleontology resources.	Class II	Class II	Class II	Class II
CR.2 – Soil moving construction activities (e.g., trenching, excavating) could impact significant and important geology resources.	Class III	Class III	Class III	Class III

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
CR.3 – Soil moving construction activities (e.g., trenching, excavating) could impact significant and important geomorphology resources.	Class II	Class II	Class II	Class II
CR.4 – Soil moving construction activities (e.g., trenching, excavating) could impact significant and important prehistoric cultural resources.	Class II	Class II	Class II	Class II
CR.5 – Soil moving construction activities (e.g., trenching, excavating) could impact significant and important historical cultural resources.	Class II	Class II	Class II	Class II
CR.6 – Construction of the proposed project adjacent to or in the vicinity of archaeological or historical sites may result in the looting, vandalism or destruction of cultural resources by construction employees or persons visiting the construction site.	Class II	Class II	Class II	Class II
Land Use (Section 5.9)				
No Impacts to Land Use have been identified				
Utilities and Public Services (Section 5.10)				
UP.1 – Impacts to Water Services during construction.	Class III	Class III, reduced in severity	Class III	Class III
UP.2 – Impacts to Water Services during operation.	Class IV	Class IV	Class IV	Class IV
UP.3 – Impacts to Energy Resources.	Class III	Class III, reduced in severity	Class III, slightly more severe	Class III
UP.4 – Impacts to Fire Protection and Emergency Response Services.	Class II	Class II, reduced in severity	Class II	Class II
UP.5 – Impacts to Law Enforcement.	Class III	Class III, reduced in severity	Class III	Class III
UP.6 – Impacts to Waste Disposal Services.	Class III	Class III, reduced in severity	Class III, slightly more severe	Class III
UP.7 – Impacts to School facilities.	Class III	Class III, reduced in severity	Class III, slightly more severe	Class III
UP.8 – Impacts to roads and road maintenance.	Class III	Class III, reduced in severity	Class III	Class III
Transportation/Circulation (Section 5.11)				
T.1 – Construction associated with the project would temporarily add to local road traffic	Class II	Class II	Class II	Class II
T.2 – Pipeline construction would require partial road closures and reduce the number of travel lanes during peak traffic periods for roadways with an LOS of D or worse,	Class II	Class II	Class I	Class II

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
resulting in a disruption of traffic flow and/or traffic congestion				
T.3 – Partial street closures would temporarily restrict access to and from private property and adjacent land uses.	Class II	Class II	Class I	Class II
T.4 – Construction activities could interfere with emergency response by ambulance, fire, paramedic, and police vehicles.	Class II	Class II	Class II	Class II
T.5 – Pedestrian circulation would be affected by project activities if pedestrians are unable to pass through a construction zone.	Class III	Class III	Class III	Class III
T.6 – Construction activities could result in physical damage to road surfaces.	Class II	Class II	Class II	Class II
T.7 – Operation of WTP, pump stations and pipeline would add truck traffic on local roads.	Class III	Class III	Class III	Class III
T.8 – A pipeline failure could disrupt traffic during repairs.	Class II	Class II	Class I	Class II
Aesthetics/Visual Resources (Section 5.12)				
VR.1 – Visual impacts due to long-term presence of water intake structures at Nacimiento Dam.	Class II	Class II	Class I	Class II
VR.2 – Visual impacts due to long-term presence of WTP, WTP storage tanks, and the pump station	Class III	Class III, less severe	Class II	Class III,
VR.3 – Visual impacts due to long-term presence of Salinas River suspended pipe crossing..	Class III	Class III	No Impact	Class III
VR.4 – Visual impacts due to long-term presence of surge tank in the vicinity of Templeton treated water pipeline turnout site.	Class II	Class II	No Impact	Class II
VR.5 – Visual impacts due to long-term presence of Rocky Canyon Road storage tank and Happy Valley pump station.	Class II	Class II	No Impact	Class II
VR.6 – Visual impacts due to long-term presence of Cuesta Tunnel Storage Tank	Class III	Class III	Class II	Class III
VR.7 – Visual impacts due to long-term presence of turnouts and air release valves.	Class III	Class III	Class III	Class III
VR.8 – Visual impacts due to change in the Lake Nacimiento level resulting from the release of additional water.	Class III	Class III	Class III	Class III
VR.9 – Visual impacts due to long-term presence of river discharge facilities.	No Impact	Class III	Class III	Class III
VR.10 – Visual impacts due to long-term presence of California Men's Colony (CMC) WTP	No Impact	No Impact	Class III	No Impact
VR.11 – Visual impacts due to long-term presence of	No Impact	No Impact	Class II	No Impact

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
Templeton WTP				
VR.12 – Visual impacts due to long-term presence of Santa Margarita WTPs.	No Impact	No Impact	Class II	No Impact
Agricultural Resources (Section 5.13)				
AG.1 – Water pipeline construction within the road right-of-way has the potential to adversely impact access to and maintenance of agricultural operations.	Class II	Class II	Class II	Class II
AG.2 – Water pipeline construction (including fence removal and trenching) along property boundaries has the potential to impact ranching and livestock operations.	Class II	Class II	Class II	Class II
AG.3 – Water pipeline construction has the potential to permanently impact soils on grazing and croplands due to improper soil replacement and/or reseeding efforts.	Class II	Class II	Class II	Class II
AG.4 – Water pipeline construction activities have the potential to adversely impact agricultural lands through the spread of noxious weeds or wind-borne dust.	Class II	Class II	Class II	Class II
AG.5 – The pipeline alignment would displace some vineyards and orchards during construction.	No Impact	No Impact	Class III	No Impact
Recreation Resources (Section 5.14)				
REC.1 – The partial relocation of a log boom 500 feet from the intake location would prohibit all recreational activity on approximately 2 additional acres of lake surface area.	Class III	Class III	Class III	Class III
REC.2 – Implementation of the proposed project would result in insignificant adverse impacts to recreational resources at Lake Nacimiento, as compared to historic conditions, due to the additional lowering of water levels to elevations below 748 feet.	Class III	Class III	Class III	Class III
REC.3 – Open trench construction along the following reaches would result in short-term impacts to bicyclists: Rocky Canyon Road to Santa Margarita, Santa Margarita to the Cuesta Tunnel, Cuesta Tunnel to San Luis Obispo WTP, San Luis Obispo WTP to Highway 227/Santa Fe Road, and Highway 227.	Class II	Class II	Class II	Class II
REC.4 – Partial loss of access to recreational opportunities at Laguna Lake Park due to water pipeline installation activities along Reach No. 10 (Sta. 2520+00-2935+00) near Dalidio Drive in San Luis Obispo.	Class II	Class II	Class II	Class II
REC.5 – Portions of the adopted Salinas River Trail System may need to be re-routed due to the construction of water	No Impact	Class II	No Impact	Class II

Table 6.1 CEQA Comparison of Project Alternatives by Issue Area

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option	1997 NWP EIR Project Alignment Alternative	Phased Raw and Treated Water Alternative
recharge facilities associated with the raw water option.				
Socioeconomic Resources (Section 5.15)				
SE.1 – Water pipeline construction activities located within the road ROWs near business centers (Paso Robles, Santa Margarita, and San Luis Obispo) have the potential to cause adverse impacts to industries located within and adjacent to project areas by impeding standard business practices. The majority of businesses that would be affected for the short-term are those located within or adjacent to construction areas on North River Road, El Camino Real in Santa Margarita, at the intersection of Dalidio Drive and Madonna Road, along Dalidio Drive, Prado Road extension, and Highway 227. These businesses may experience short-term impedance to business caused by road closures in front of businesses, some difficulties accessing store fronts, and nuisance to patrons from construction activities. This impedance to business would average one to two days during construction (based on construction of 50 to 100 feet of pipeline per day).	Class III	Class III	Class III	Class III
SE.2 – Implementation of the proposed project would result in insignificant adverse impacts to businesses that rely on tourism/recreational activities at Lake Nacimiento, as compared to historic conditions, due to the additional lowering of water levels to elevations below 748 feet.	Class III	Class III	Class III	Class III
SE.3 – Implementation of the proposed project would result in insignificant adverse impacts to property values surrounding Lake Nacimiento resulting from changes in lake levels.	Class III	Class III	Class III	Class III

Table 6.2 CEQA Comparison of the Superior Alternative by Issue Area

Issue Area	Duration of Adverse Impacts	Superior Alternative	Discussion of Rationale for Superior Alternative
Hydrology and Water Quality	Long-Term	Proposed Project Treated Water Proposed Project Raw Water	<ul style="list-style-type: none"> The Treated Water Option would avoid impacts associated with all other alternatives with a raw water discharge component where degradation of groundwater quality could occur. However, while improvements in water quality under the raw water alternative would not be as great as the treated water alternative, potential impacts of raw water discharges would be considered negligible. Construction of the Lake Nacimiento intake structure under the 1997 EIR Alternative would result in significant increases in lake turbidity levels and impacts on MCRWA power plant facilities.
Geology, Seismicity and Soils	Long-Term	None Superior	<ul style="list-style-type: none"> All alternatives would be somewhat susceptible to impacts from earthquakes. All alternatives would require excavation in rock or soils containing asbestos, thus increasing potential health risks.
Drainage, Erosion, and Sedimentation	Short-Term	None Superior	<ul style="list-style-type: none"> Impacts associated with all alternatives are similar. However, the Treated Water Option would avoid impacts associated with all other alternatives with a raw water discharge component where high river flow would impact facilities associated with water discharge basins and pipelines. However, damage to project facilities is not an environmental impact and can be avoided through proper project design and construction.
Air Quality	Short-Term	Proposed Project Raw Water	<ul style="list-style-type: none"> The Raw Water Option would avoid construction and toxic air contaminant emission associated with the Treated Water Option WTP. 1997 EIR Alternative and Phased Raw/Treated Alternatives would have higher emissions due to greater construction activities associated with discharge and WTP construction activities.
Noise	Short-Term	Proposed Project Treated Water Raw Water Phased Alt.	<ul style="list-style-type: none"> Construction noise impacts associated with the 1997 EIR Alternative would be significant due to noise increases above ambient levels in sensitive receptor areas adjacent to the Templeton and Santa Margarita WTP sites. Construction noise levels associated with the proposed project (Treated and Raw Water Options), and Phased Raw/Treated Alternative can be mitigated to a level that is less than significant. Mitigated operational noise impacts associated with all alternatives would be mitigated to a level that is less than significant.
Hazards and Hazardous Materials	Long-Term	Proposed Project Raw Water	<ul style="list-style-type: none"> Raw Water Option would avoid the need to transport, store and utilize hazardous chemicals associated with water treatment at new WTP sites.
Biological Resources	Short-Term	Proposed Project Raw Water	<ul style="list-style-type: none"> Pipeline and facility construction impacts very similar for all alternatives, although the raw water option would avoid construction of the WTP in an area designated as kit fox habitat. Alternatives with raw water and river discharge component would have added impact of the

Table 6.2 CEQA Comparison of the Superior Alternative by Issue Area

Issue Area	Duration of Adverse Impacts	Superior Alternative	Discussion of Rationale for Superior Alternative
	Long-Term		<p>loss of riparian habitat (Raw Water Option, 1997 EIR Alternative, Phased Raw/Treated Water Alternative), although replacement of riparian habitat at a 3:1 ratio completely offsets any potential adverse impact associated with the project.</p> <ul style="list-style-type: none"> Alternatives with raw water component would avoid impacts associated with pipeline failures and chlorinated water spill impacts on sensitive biota (Raw Water Option, 1997 EIR and Phased Raw/Treated Water Alternatives prior to use of water treatment). While it is unlikely that a significant chlorinated water spill could occur, it is still possible. Under the raw water option, portions of the pipelines would contain chlorinated water, but a majority of the water transported would not be chlorinated, thus substantially reducing the potential for a chlorinated spill and associated impacts. Alternatives with both raw and treated water components would have impacts due to riparian habitat loss and chlorinated water spill impacts on sensitive biota (1997 EIR Alternative and Phased Raw/Treated Water Alternative).
Cultural Resources	Long-Term	1997 EIR Alternative	<ul style="list-style-type: none"> All alternatives would have the potential to impact important paleontology, geomorphology, and prehistoric/historical cultural sites. However, the 1997 EIR Alternative would utilize a more urban route and impact fewer previously undisturbed sites.
Land Use	Long-Term	None Superior	<ul style="list-style-type: none"> All alternatives would be consistent with current land use plans.
Utilities and Public Services	Short-Term	None Superior	<ul style="list-style-type: none"> Impacts would be about the same for all alternatives and would be less than significant. The Raw Water Option would have slightly lower impacts on police and fire services through the avoidance of hazardous material use at the proposed WTP. However, this impact is reflected in the discussion of Hazardous Materials above, and is considered less than significant.
Transportation/Circulation	Short-Term	Proposed Project Treated Water Raw Water Phased Alt.	<ul style="list-style-type: none"> Construction impacts associated with the proposed project (Treated and Raw Water Options), and the Phased Raw/Treated Water Alternative would be about the same. The 1997 EIR Alternative would follow a more urban route and have a substantial impact on numerous roads, temporarily reducing the level of service to unacceptable levels and resulting in substantial delays to traffic on Nacimiento Lake Drive.
Aesthetics/Visual Resources	Long-Term	Proposed Project Raw Water	<ul style="list-style-type: none"> All alternatives have short- and long-term impacts associated with construction activities and project facilities that are considered less than significant. The Treated Water Option avoids visual impacts associated with river discharge facilities. The Raw Water Option avoids visual impacts associated with the WTP. 1997 EIR Alternative intake structure on south side of Nacimiento Dam would result in significant visual impact to visitors to Lake Nacimiento Resort.
Agricultural Resources	Short-Term	Proposed Project Treated Water	<ul style="list-style-type: none"> Impacts are nearly identical for all alternatives. The 1997 EIR Alternative would result in the temporary destruction of portions of some

Table 6.2 CEQA Comparison of the Superior Alternative by Issue Area

Issue Area	Duration of Adverse Impacts	Superior Alternative	Discussion of Rationale for Superior Alternative
		Raw Water Phased Alt.	vineyards and orchards during construction.
Recreation Resources	Long-Term	Proposed Project Treated Water	<ul style="list-style-type: none"> • Impacts on recreational resources are very similar for all alternatives. • Raw Water Option and Phased Raw/Treated Alternative would impact recreational activities along portions of the adopted Salinas River Trail System.
Socioeconomic Resources	Long-Term	None Superior	<ul style="list-style-type: none"> • Project construction impacts nearly identical for all alternatives. • All alternatives would have similar socioeconomic impacts during project operation, mainly resulting from the lowering of Lake Nacimiento water levels and concurrent impact on recreational/tourism activities.

In this case, the environmentally preferred alternative for this issue area would be the one based on the more favorable long-term impact.

For some issue areas, impacts associated with the proposed project were similar to that for the alternatives, so no superior alternative was identified for that issue area. In addition, the identification of the superior alternative for each issue area does not necessarily indicate that the potential impacts would not be adverse, but only less adverse than the other alternatives. While there may have been some slight differences between the proposed project and alternatives for these issue areas (i.e., differences in impacts that would generally be imperceptible), impacts were generally adverse and of short duration. Therefore, issue areas with similar adverse short-term impacts for the proposed project and alternative were dropped from the comparison of alternatives.

6.1.1 Proposed Project vs. No Project/No Action Alternative

Numerous potentially significant impacts were identified for the proposed project, most of which could be mitigated to a level considered less than significant (Class II). One significant (Class I) impact was identified for the proposed project, both the Treated and Raw Water Options, and is summarized below. Significant (Class I) impacts are associated, in general, with only one aspect of the proposed project: the significant air pollutant emissions in the region that would occur during construction and as summarized as follows:

- **Air Quality**

- AQ.1 Construction activities would generate air emissions that would impact air quality in the area. Air pollutant emissions during pipeline and facility construction would exceed the San Luis Obispo County Air Pollution Control District's significance thresholds, even after implementation of all feasible mitigations. This impact would only last during the construction of the project, with air quality impacts during project operations being less than significant.

Because the No Project/No Action Alternative would avoid this potentially significant impact, this alternative is considered environmentally superior to the proposed project.

6.1.2 Proposed Project vs. 1997 NWP EIR Alternative

The proposed project Treated and Raw Water Options are clearly superior to the NWP 1997 EIR Alternative due to the avoidance of several Significant Class I Impacts. In addition to the Significant Class I Impacts identified above for the proposed project, the NWP 1997 EIR Alternative would result in the following significant impacts:

- **Hydrology and Water Quality**

- WQ.10 For the 1997 EIR Project south side intake location and design, there would be an increased potential for turbidity in discharges from the MCWRA power plant during NWP intake construction. Under the 1997 EIR Alternative, the intake was proposed to be tunneled from the south side of the dam, as opposed to the proposed project north side tunneling plan. In addition, the lowest level inlet was positioned at 660 feet elevation (10 feet below the current plan) and included a

dredged channel leading into the inlet. This would result in an increased potential for turbidity in discharges from the MCWRA power plant during NWP intake construction.

- Noise
 - N.1 Construction noise would temporarily increase ambient daytime noise levels along the pipeline route and near the pump station and WTP sites. Short-term sound levels would exceed acceptable levels at nearby sensitive receptors during construction of the project facilities.
- Transportation/Circulation
 - T.2 Pipeline construction would require partial road closures and reduce the number of travel lanes during peak traffic periods for roadways with an LOS of D or worse, resulting in a disruption of traffic flow and/or traffic congestion. This impact would be more severe than in the proposed project due to the proposed route, and especially along Nacimiento Lake Drive.
 - T.3 Partial street closures would temporarily restrict access to and from private property and adjacent land uses. Limited route alternatives along Nacimiento Lake Drive would result in substantial delays and impede access to private property.
 - T.8 A pipeline failure could disrupt traffic during repairs. A failure along Nacimiento Lake Drive would result in substantial traffic delays, with no suitable alternative route available.
- Aesthetics/Visual Resources
 - V.1 Visual impacts due to long-term presence of the pump station and water intake structures at Nacimiento Dam adjacent to Nacimiento Lake Drive and Lake Nacimiento Resort.

Because the proposed project would avoid these impacts, as well as several other impacts that can be mitigated to a level of insignificance, the proposed project is clearly environmentally superior to the NWP 1997 EIR Alternative.

6.1.3 Proposed Project vs. Phased Raw and Treated Water Alternative

Because this alternative is a combination of the co-equal project options of a Raw or Treated Water Project, all of the significant (Class I) impacts associated with the proposed project would occur under this alternative. The Phased Raw/Treated Water Alternative would result in all of the impacts that are unique to the proposed project Treated or Raw Water Options, thus combining the less desirable aspects of each option. Therefore, the proposed project would also be environmentally superior to the Phased Raw/Treated Water Alternative.

6.1.4 Proposed Project Treated Water vs. Raw Water Option

Distinguishing the differences between the proposed project Treated and Raw Water Options was much more subtle. Both options would result in the same impacts that have been identified

as significant and for which adequate mitigation has not been identified. Therefore, the identification of a superior alternative needs to be based on an evaluation of the unique less-than-significant impacts identified for each option.

Table 6.3 provides a comparison of the differences between the proposed project Treated and Raw Water Options. This table indicates that the Treated Water Option would avoid some environmental impacts unique to the Raw Water Option in several areas including:

- Hydrology and Water Quality,
- Drainage, Erosion, and Sedimentation,
- Aesthetics/Visual Resources, and
- Recreational Resources.

Likewise, the Raw Water Option would avoid or lessen impacts unique to the Treated Water Option in several areas including:

- Air Quality,
- Hazards and Hazardous Materials,
- Biological Resources,
- Utilities and Public Services, and
- Aesthetics/Visual Resources.

In the area of biological resources, the Treated Water Option would avoid impacts to riparian habitat associated with the Raw Water Option discharge facilities, although this impact was completely mitigated under the Raw Water Option. The Raw Water Option would substantially lessen impacts associated with the spill of chlorinated water in the event of a pipeline failure, since water treatment would only occur on two end portions of the pipeline (second pipeline from Atascadero to Santa Margarita; CMC WTP to Airport Area).

The Raw Water Option avoids more impacts numerically, although each of the impacts it avoids is considered less than significant. The main differentiating factors between the two options are in the areas of biological resources, air quality and hazardous materials, where the Raw Water Option is superior to the Treated Water Option, while still enhancing the project goals of improving water quality in the area. Therefore, the Raw Water Option is considered environmentally superior to the Treated Water Option.

6.2 CEQA Environmentally Superior Alternative

The No Project Alternative was clearly found to be the environmentally superior alternative. This alternative would eliminate all of the Significant Class I impacts associated with the proposed project. However, with no action, groundwater overdraft in SLO County is expected to continue to increase, resulting in lowered groundwater levels, deteriorating water quality, potential aquifer subsidence and damage, and increased pumping costs, and increased competition between agricultural interests and domestic users. Supply shortages during drought periods could occur in

some communities.

Table 6.3 Comparison of Proposed Project Options by Impact Differences

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option
Hydrology And Water Quality (Section 5.1)		
WQ.6 – Potential degradation of groundwater quality resulting from aquifer discharge using Lake Nacimiento water containing elevated metals concentrations.	No Impact	Class II
WQ.7 – Potential nuisances caused by the presence of vegetation in the ponds and/or eutrophication.	No Impact	Class II
WQ.8 – Impacts from lack of sufficient capacity of the Paso Robles Discharge Area to take full NWP deliveries.	No Impact	Class II
WQ.9 – Impacts from lack of sufficient capacity of the City of Paso Robles' Thunderbird well field to extract the total combined water right to Salinas River underflow after adding the NWP water right.	No Impact	Class II
Drainage, Erosion, and Sedimentation (Section 5.3)		
DE.7 – Potentially significant impact of high river flow or bank erosion resulting in damage to branch pipelines or discharge piping in the three discharge areas.	No impact	Class II
Air Quality (Section 5.4)		
AQ.1 – Construction activities would generate air emissions that would impact air quality in the area. Air pollutant emissions during pipeline and facility construction would exceed the San Luis Obispo County Air Pollution Control District's significance thresholds, even after implementation of all feasible mitigations.	Class I	Class I, lessened because the WTP would not be constructed.
AQ.2 – Operations of the project facilities would generate air emissions that could impact air quality in the area.	Class II	Class III, lessened because the WTP would not operate
AQ.3 – Increased emissions of toxic compounds due to the project could result in increased health risks.	Class III	Class III, lessened because the WTP would not operate
Hazards and Hazardous Materials (Section 5.6)		
HM.6 – During operation of the WTP, the employees and public could be exposed to the hazardous chemicals transported to, used, and stored at the plant.	Class II	No Impact
HM.7 – Accidental release of large quantities of treated water into a fresh water body could be harmful to the organisms in the water body.	Class III	No Impact
Biological Resources (Section 5.7)		
BR.6 – Impacts to aquatic life from treated water spills in case of the treated water pipeline rupture during operational phase of the project.	Class III	No Impact
BR.9 – Impacts to riparian habitat due to construction of the water discharge areas in the vicinity of Salinas River.	No Impact	Class II
Utilities and Public Services (Section 5.10)		
UP.4 – Impacts to Fire Protection and Emergency Response Services.	Class II	Class II, lessened because WTP would not be built.
UP.6 – Impacts to Waste Disposal Services.	Class III	Class III, lessened because no waste products from WTP operation.
Aesthetics/Visual Resources (Section 5.12)		
VR.2 – Visual impacts due to long-term presence of WTP, WTP storage tanks, and the pump station.	Class III	Class III, lessened because only storage tanks would be build

Table 6.3 Comparison of Proposed Project Options by Impact Differences

Impact Summary	Proposed Project Treated Water Option	Proposed Project Raw Water Option
		and no WTP
VR.9 – Visual impacts due to long-term presence of river discharge facilities.	No Impact	Class III
Recreation Resources (Section 5.14)		
REC.5 – Portions of the adopted Salinas River Trail System may need to be re-routed due to the construction of water recharge facilities associated with the raw water option.	No Impact	Class II

The No Project Alternative would also not meet the Applicant's objectives of the project, which is to provide a reliable supplemental water source for a variety of uses within SLO County by supplementing the local ground and surface water supplies with a new surface water source. CEQA Guidelines Section 15126.6(e)(2) states "If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The proposed project with mitigation would be the next environmentally superior alternative. The EIR includes an analysis of the No Project Alternative, as required by CEQA and NEPA guidelines. However, pursuant to the requirements of NEPA Section §1502.14, the No Project Alternative may not be legally feasible to be identified as the Federal agency's preferred alternative.

As noted above, the proposed project is clearly superior to the NWP 1997 EIR Alternative as a result of avoiding several Significant Class I Impacts. The proposed project would also be environmentally superior to the Phased Raw/Treated Water Alternative, because this alternative combines the less desirable aspects of each proposed project option.

Because the Raw Water Option numerically avoids or lessens more impacts identified for the Treated Water Option, and avoids or lessens potential impacts in the sensitive environmental areas of biological resources, air quality and hazardous materials, the Raw Water Option was selected over the Treated Water Option. Based on the CEQA requirement to identify an environmentally superior alternative from the remaining alternatives, the proposed project Raw Water Option was identified as the Environmentally Superior Alternative.

6.3 NEPA Preferred Alternative

NEPA requires that all reasonable alternatives, including the alternative of no action, should be analyzed, and the NEPA Lead Agency's preferred alternative, or alternatives, should be identified unless another law prohibits the expression of such a preference. Alternatives were evaluated for those areas within ACOE jurisdiction.

As with the analysis under CEQA, the No Project/No Action Alternative would constitute the NEPA Preferred Alternative. However, under NEPA Section §1502.14 the No Action Alternative may not be legally feasible to be identified as the CEQA or Federal agency's preferred alternative. Therefore, the NEPA Preferred Alternative was selected from the remaining alternatives.

Given the fact that the NWP 1997 EIR Alternative would avoid Camp Roberts' lands and many of the river/stream crossings associated with the proposed project, this alternative would appear to be superior to all other alternatives for the areas within the ACOE jurisdiction. However, selecting a preferred alternative based only on potential impacts within the ACOE's jurisdiction would ignore potential impacts that would occur in other areas as a result of ACOE's actions on the project. Therefore, the proposed project Raw Water Option is considered the NEPA Preferred Alternative based on overall project impacts, as well as the avoidance of the need to construct the WTP that is proposed for Camp Roberts under the Treated Water Option.

6.4 Least Environmentally Damaging Practicable Alternative

Issuance of a Department of the Army permit, under Section 404 of the Clean Water Act, is prohibited unless the ACOE has determined that the project constitutes the LEDPA. In this context, "practicable" means "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes."

The LEDPA is based on the analyses described in the Draft Environmental Impact Report and input received from citizens and governmental agencies (i.e., local government officials and Federal and State environmental regulatory and resource agencies). While the public participation process has not been completed, the proposed project Raw Water Option has been identified as the LEDPA.